

FILED
HARRISBURG, PA
SEP 09 2015
MARIA E. ELKINS, CLERK
Per *[Signature]*

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	NO. 1:15-CR-193
)	
v.)	
)	(JUDGE Caldwell)
JAY EUGENE REED)	
)	(ELECTRONICALLY FILED)
Defendant.)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From on or about May 31, 2014, continuing to on or about July 9, 2015, in the Middle District of Pennsylvania, the defendant,

JAY EUGENE REED

did intentionally and knowingly use, persuade, induce, entice or coerce a minor to take part in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that the materials for said production had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including a cellular telephone or computer.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

On or about July 9, 2015, in the Middle District of Pennsylvania, the
defendant,

JAY EUGENE REED

knowingly possessed and caused to be possessed images of child pornography, as defined in Title 18 United States Code, Section 2256, depicting minors engaged in sexually explicit conduct, including prepubescent minors or minors who had not attained 12 years of age, that had been mailed, shipped and transported in interstate or foreign commerce by any means, including by cellular telephone or computer, that is, images depicting the lascivious exhibition of a minor's genitals and pubic area.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B);
Title 18 United States Code § 2252A(b)(2).

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

On or about July 13, 2015, in the Middle District of Pennsylvania, the defendant,

JAY EUGENE REED,

knowingly and corruptly persuaded and attempted to corruptly persuade Jane Doe #3, a person known to the grand jury, with the intent to hinder, delay, and prevent communication to law enforcement officers of information relating to the

commission or possible commission of a federal offense, that is, the sexual exploitation of children, a violation of 18 United States Code, Section 2251(a).

Specifically, on or about July 13, 2015, the defendant did send Jane Doe #3 a letter stating, "I can't remember where you said you were takeing the girls to. Why do they have to go. They already gave statements. Don't volenteer anything extra...They will try to trick them into saying something that will hurt me."

All in violation of Title 18, United States Code, Section 1512(b)(3).

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

On or about July 25, 2015, in the Middle District of Pennsylvania, the defendant,

JAY EUGENE REED,


knowingly and corruptly persuaded and attempted to corruptly persuade Jane Doe #1, a person known to the grand jury, with the intent to hinder, delay, and prevent communication to law enforcement officers of information relating to the commission or possible commission of a federal offense, that is, the sexual exploitation of children, a violation of 18 United States Code, Section 2251(a). Specifically, on or about July 25, 2015, the defendant did send Jane Doe #1 a letter stating, "I hope you and [Jane Doe #2] are not talking to anyone about this case."

All in violation of Title 18, United States Code, Section 1512(b)(3).

A TRUE BILL


FOREPERSON

9/9/2015
DATE


PETER J. SMITH
UNITED STATES ATTORNEY